

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

**BMG RIGHTS MANAGEMENT
(US) LLC, and ROUND HILL
MUSIC LP**

Plaintiffs,

V.

Case No. 1:14-cv-1611(LOG/JFA)

**COX ENTERPRISES, INC.,
COX COMMUNICATIONS, INC.,
COXCOM, LLC**

Defendants.

**BMG RIGHTS MANAGEMENT (US) LLC AND ROUND HILL MUSIC LP'S
CORRECTED MOTION TO COMPEL THE IDENTITIES OF THE DIRECT
INFRINGERS**

Pursuant to Federal Rule 37 and Local Rule 37, Plaintiffs BMG Rights Management (US) LLC and Round Hill Music LP (collectively “Copyright Holders”) respectfully submit this Motion to Compel Defendant Cox Communications Inc. (“Cox”) to comply with the Copyright Holders’ discovery request to identify the names and other related information of its subscribers that have been the subject of infringement notices for the copyrighted works at issue in this case. Specifically, the Copyright Holders move the Court to order Cox answer Interrogatory No. 13 which asks for the names and other related information of Cox’s subscribers that directly infringe the copyrighted works at issue in this case.

For the reasons set forth in the accompanying Memorandum in Support, the Court should grant the Motion.

Local Rule 37(E) Meet and Confer Statement

Counsel for Copyright Holders held a telephonic meet and confer with Defendants' counsel on April 30 and May 6, 2015 concerning Cox's response to Interrogatory No. 13. Relying on the Cable Privacy Act and the need for a Court Order prior to production of subscriber information, the parties were unable to resolve this dispute. Cox indicated that it will oppose this motion.

Respectfully submitted,

/s/ Paul Gennari

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CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2015, I electronically filed a true and correct copy of the foregoing using the Court's CM/ECF system, which then sent a notification of such filing (NEF) to all counsel of record:

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